

# **EXHIBIT 13**

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
163-166

Page 163

1 T. G. GREEN  
2 personal impression was that after the many  
3 rounds that had taken place, that there might  
4 not at that point might be another round.  
5 And then September 15th happened,  
6 the Citigroup attempt to purchase Wachovia,  
7 which then didn't go through. Speaking of the  
8 stock price had some impact unfavorable when  
9 it didn't go through. And other events at the  
10 senior level of Citi that were negative  
11 happened in the markets.  
12 And so we were then contacted by  
13 Frank, you know, I believe it was early  
14 November, I guess it could have been late  
15 October, but some time in the fall that it  
16 looked like there would be another RIF and it  
17 would be significant.  
18 Q. And then the next -- in any  
19 subsequent conversation the you had with Frank  
20 Chin, I understand you don't really remember  
21 what was discussed when, what was discussed in  
22 subsequent conversations after this initial?  
23 A. So in these meetings?  
24 Q. Yes.  
25 A. Well, this requires a little bit

Page 164

1 T. G. GREEN  
2 of background on public finance at Citi. We  
3 had been the number one ranked firm in public  
4 finance as of '08 for something like 12 or the  
5 prior 13 years or 14 out of 15 whatever, a  
6 long time. And that's by ranking of dollar  
7 volume of bonds sold. And we had also been,  
8 you know, a good revenue producing group.  
9 And so with a RIF of that  
10 consequence, both dollars and head count, I do  
11 remember discussions with Frank, and I think  
12 also similar topics were discussed in the  
13 meeting that involved the healthcare guy, Fred  
14 Hessler and Bart as well, about okay, how do  
15 we maintain our leadership in the business  
16 with this kind of cut.  
17 Q. Now at what point did you submit a  
18 layoff list to Frank Chin?  
19 A. I don't remember the date. It  
20 would have been in early November.  
21 Q. Clearly it was --  
22 A. Since then I cut the -- the  
23 meetings taking place in early November, it  
24 would have been then. If they would have been  
25 in early October, it would have been some time

Page 165

1 T. G. GREEN  
2 after that.  
3 Q. Clearly it was some time after the  
4 first time you spoke to Frank Chin?  
5 A. Of course he had to tell me what I  
6 needed to provide. And again David Brownstein  
7 might have been there, I don't recall.  
8 Q. Do you recall providing Mr. Chin  
9 with the layoff list prior to the subsequent  
10 discussions you had about the layoff?  
11 A. I don't recall the order of  
12 things, but I believe I provided my RIF list  
13 for Infrastructure.  
14 Q. Prior to the subsequent  
15 discussions?  
16 A. Or contemporaneous with.  
17 Q. Were any people discussed, any of  
18 the people in the layoff list, discussed at  
19 these subsequent meetings?  
20 A. I think there -- yes, there were  
21 some discussions of people.  
22 Q. Do you recall the people who were  
23 discussed?  
24 A. I mean, I recall discussions with  
25 respect to the regions, not so much of people,

Page 166

1 T. G. GREEN  
2 but would we have a Denver office, for  
3 example, where we had two bankers or not. And  
4 was that -- again, the organization as a  
5 business and we have been number one and its  
6 worked really well on a, you know, leadership  
7 and public finance perspective over the years.  
8 Frank has been the head of the  
9 department for a very long time. We have the  
10 regions and we have the product groups kind of  
11 working in tandem as a matrix, if you will.  
12 And having some regional presence was a big  
13 part of that. So I do remember discussing  
14 whether the Denver office should be closed  
15 since there are two bankers there.  
16 Q. Were there any other names  
17 mentioned other than the -- were the names of  
18 these two Denver bankers mentioned or the  
19 concept of --  
20 A. Yes. Again, it was more about  
21 whether to have the office. My memory is we  
22 closed the office. So those two bankers were  
23 on the list.  
24 Q. Were any other specific names  
25 discussed at these meetings?



800.211.DEPO (3376)  
EsquireSolutions.com

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
193-196

<p style="text-align: right;">Page 193</p> <p>1 T. G. GREEN</p> <p>2 B on an A, B, C scale three weeks prior -- in</p> <p>3 May of '08.</p> <p>4 Q. And then about seven months prior</p> <p>5 to the evaluation you put them both on a B</p> <p>6 list, correct?</p> <p>7 A. Yes, they were there for a couple</p> <p>8 of months at that point I put them on the same</p> <p>9 B list.</p> <p>10 Q. So is there any indication on</p> <p>11 these documents that Matt Chin was a better</p> <p>12 performer than Brittany Sharpton?</p> <p>13 A. On which documents are we limiting</p> <p>14 this question to?</p> <p>15 Q. On Plaintiff's Exhibit 430 and</p> <p>16 Plaintiff's Exhibit 434.</p> <p>17 A. I would say there is a hint on</p> <p>18 431. On 430 and 434 it doesn't appear to be</p> <p>19 any indication.</p> <p>20 MR. BATTAGLIA: By the way, my</p> <p>21 paralegal has confirmed that this is the</p> <p>22 attachment to this.</p> <p>23 MR. DATOO: It is an attachment to</p> <p>24 that?</p> <p>25 MR. BATTAGLIA: Yes. These</p>	<p style="text-align: right;">Page 195</p> <p>1 T. G. GREEN</p> <p>2 people in your group about Ms. Sharpton's work</p> <p>3 performance between the time you completed her</p> <p>4 evaluation and the November RIF?</p> <p>5 A. I don't remember any specific</p> <p>6 conversations.</p> <p>7 Q. Did you get any feedback from</p> <p>8 anyone in your group regarding Matt Chin</p> <p>9 during the same time frame?</p> <p>10 A. I don't recall any conversations.</p> <p>11 Q. Why did you select Tom Bradshaw</p> <p>12 for layoff?</p> <p>13 A. Tom Bradshaw and Ron Moreno were</p> <p>14 co-heads of transportation within my</p> <p>15 Infrastructure Group. That's kind of a</p> <p>16 marketing title, if you would, not a separate</p> <p>17 group per se.</p> <p>18 And my memory is that, again, the</p> <p>19 RIF had to involve substantial compensation</p> <p>20 cuts, as well as substantial head count. So I</p> <p>21 had to think about Ron and Tom comparatively.</p> <p>22 And they both longstanding senior</p> <p>23 transportation bankers.</p> <p>24 Again, this was a RIF that was a</p> <p>25 RIF, it wasn't something people wanted to be</p>
<p style="text-align: right;">Page 194</p> <p>1 T. G. GREEN</p> <p>2 documents are in conjunction. So if</p> <p>3 that helps.</p> <p>4 Q. You testified you don't recall</p> <p>5 seeing 431?</p> <p>6 A. I don't recall seeing that.</p> <p>7 Q. Your counsel has just indicated</p> <p>8 that his office has confirmed that Plaintiff's</p> <p>9 Exhibit 431 is an attachment to Plaintiff's</p> <p>10 Exhibit 430.</p> <p>11 MR. BATTAGLIA: The e-mail</p> <p>12 beginning on 20498 and ending on 20501</p> <p>13 has an attachment to it of what has been</p> <p>14 mark as 20502.</p> <p>15 MR. DATOO: Yes.</p> <p>16 MR. BATTAGLIA: I have different</p> <p>17 numbers, I don't have this on mine. So</p> <p>18 yes, that's attached to that.</p> <p>19 THE WITNESS: Got it.</p> <p>20 Q. Do you recall opening up this</p> <p>21 attachment?</p> <p>22 MR. BATTAGLIA: Objection.</p> <p>23 A. I don't recall opening up this</p> <p>24 attachment.</p> <p>25 Q. Did you get any feedback from</p>	<p style="text-align: right;">Page 196</p> <p>1 T. G. GREEN</p> <p>2 doing. On balance I thought Ron was more</p> <p>3 important to maintaining the leadership of</p> <p>4 Citigroup in transportation, service</p> <p>5 transportation finance compared to Tom. And I</p> <p>6 couldn't keep two co-heads at that level of,</p> <p>7 you know, compensation.</p> <p>8 Q. In reducing their comp wasn't an</p> <p>9 option in this late off?</p> <p>10 MR. BATTAGLIA: Objection. You</p> <p>11 may answer.</p> <p>12 A. My memory is it was not an</p> <p>13 option --</p> <p>14 Q. Did you take a look at their -- I</p> <p>15 am sorry.</p> <p>16 A. -- in this layoff.</p> <p>17 Q. Did you take a look at their</p> <p>18 revenue reports?</p> <p>19 MR. BATTAGLIA: Objection. You</p> <p>20 may answer.</p> <p>21 A. At the time of the layoff just for</p> <p>22 the RIF decision?</p> <p>23 Q. Yes.</p> <p>24 A. I might have. I don't know that I</p> <p>25 did then. I am generally familiar with the</p>

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
197-200

<p style="text-align: right;">Page 197</p> <p>1 T. G. GREEN</p> <p>2 what the two of them do. I am talking about</p> <p>3 Mr. Bradshaw and Mr. Moreno.</p> <p>4 Q. Was revenue generation a</p> <p>5 consideration in deciding who to keep and who</p> <p>6 to let go?</p> <p>7 MR. BATTAGLIA: Objection. You</p> <p>8 may answer.</p> <p>9 A. Yes, the capacity to generate</p> <p>10 revenue.</p> <p>11 Q. Why did you select Kimberly Swain</p> <p>12 for layoff?</p> <p>13 A. Kimberly was also a transportation</p> <p>14 banker and fairly good processor of</p> <p>15 transactions, not significant new business</p> <p>16 capability compared to Ron or at the director</p> <p>17 level compared to like a Jamison Feheley who</p> <p>18 was a transportation specialist, as well as a</p> <p>19 former regional banker who on a comparative</p> <p>20 basis in the RIF context in November '08, you</p> <p>21 know, I thought just as I had felt Tom Boast</p> <p>22 was at an earlier RIF, somebody to RIF versus</p> <p>23 the other directors, Kimberly included.</p> <p>24 At that point I had to RIF a fair</p> <p>25 number of directors, and it was kind of Steve</p>	<p style="text-align: right;">Page 199</p> <p>1 T. G. GREEN</p> <p>2 to let go?</p> <p>3 MR. BATTAGLIA: Objection.</p> <p>4 A. The capacity to generate revenue</p> <p>5 in the future and not merely historical</p> <p>6 revenue is certainly a factor.</p> <p>7 Q. What do you mean by "capacity"?</p> <p>8 A. The capability, what would be new</p> <p>9 business capability. Sort of improving the</p> <p>10 business capability. I will give you an</p> <p>11 example. Boast had a couple of really nice</p> <p>12 pieces of wrap, but I didn't see the, you</p> <p>13 know, the that that was going to be something</p> <p>14 he could repeat.</p> <p>15 Q. Why did you select Mathilde McLean</p> <p>16 for layoff?</p> <p>17 A. Mathilde was a hire that we</p> <p>18 brought in from -- my memory is like a</p> <p>19 financial advisory firm who had a specific,</p> <p>20 somewhat narrow expertise area, which is known</p> <p>21 as state revolving fund or SRF. It is</p> <p>22 basically helping states finance clean water</p> <p>23 and waste water treatment projects. And that</p> <p>24 was an area that was what she was expert in,</p> <p>25 but there was a more senior banker who was a</p>
<p style="text-align: right;">Page 198</p> <p>1 T. G. GREEN</p> <p>2 Wood who does transportation as well OPEB POB.</p> <p>3 Jamison Feheley who does transportation, as</p> <p>4 well as some regional. And then Kimberly</p> <p>5 Swain who does transportation and also had</p> <p>6 done some regional work in the southwest and</p> <p>7 the southeast.</p> <p>8 Q. Did you take a look at the revenue</p> <p>9 reports for the directors when deciding who to</p> <p>10 RIF?</p> <p>11 A. I might have. I might have. But</p> <p>12 less -- again, it is more -- at that point</p> <p>13 we're talking about how do we at Citi Public</p> <p>14 Finance try to stay number one in our business</p> <p>15 with a significantly reduced department and</p> <p>16 group.</p> <p>17 Q. Generating revenue would be</p> <p>18 important, correct?</p> <p>19 MR. BATTAGLIA: Objection. You</p> <p>20 may answer.</p> <p>21 A. Generating revenue would be</p> <p>22 important.</p> <p>23 Q. So if someone is generating</p> <p>24 revenue, that's an important factor to</p> <p>25 consider when determining who to keep and who</p>	<p style="text-align: right;">Page 200</p> <p>1 T. G. GREEN</p> <p>2 director out in the Chicago office who was an</p> <p>3 SRF expert as well as a midwest region,</p> <p>4 regional banker in Indiana, Illinois,</p> <p>5 Michigan.</p> <p>6 And I recall in conversations with</p> <p>7 Frank and Bart in particular, you know, SRF</p> <p>8 business is not a particularly big sector in</p> <p>9 keeping someone who only does that, given how</p> <p>10 much we were downsizing the group, really</p> <p>11 didn't make sense because we had that</p> <p>12 capability with Rob, as well as I have done</p> <p>13 SRF transactions. And Marty's deputy in the</p> <p>14 quantitative group, a guy named Ryan Perkins</p> <p>15 has done SRF transactions.</p> <p>16 Q. Did you look at Mathilde McLean's</p> <p>17 revenue reports?</p> <p>18 A. I don't believe I did. She is an</p> <p>19 associate, so I don't know if she really has</p> <p>20 one.</p> <p>21 Q. Associate or vice president?</p> <p>22 A. Might have been AVP.</p> <p>23 Q. Wouldn't an AVP have one?</p> <p>24 A. Probably not.</p> <p>25 Q. Did you consider even with respect</p>

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
209-212

Page 209

1 T. G. GREEN  
2 feedback.  
3 Q. Other than recommendation from an  
4 associate, you received no other feedback  
5 regarding --  
6 A. I don't remember any other  
7 feedback during that time period.  
8 Q. During the three months that he  
9 was --  
10 A. Prior to November '08 or November  
11 -- end of November '08.  
12 Q. And was Mr. Dockery performing the  
13 job duties of a first year analyst?  
14 MR. BATTAGLIA: Objection.  
15 A. He was a first year analyst, yes.  
16 Q. Did you have an opportunity to  
17 work with him directly in that approximate  
18 three-month period of time?  
19 A. I didn't, no. To my memory.  
20 Q. Could Brittany Sharpton have  
21 performed Mr. Dockery's duties as a first year  
22 analyst?  
23 A. I think analysts can perform  
24 analyst duties, you know, it would have to be  
25 a specific project, but I would think that one

Page 210

1 T. G. GREEN  
2 analyst could perform another analyst's  
3 duties.  
4 Q. Why didn't you terminate Alan  
5 Dockery instead of Brittany Sharpton?  
6 MR. BATTAGLIA: Objection. You  
7 may answer.  
8 A. Well, again the thing about  
9 analysts is they are in classes. So you have  
10 first years, second years, third years, maybe  
11 something after that. As a manager you want  
12 to have somebody in each class or you're going  
13 to have -- analysts come and go a lot, a lot  
14 of them are like the paralegals from  
15 investment banking, so they will go back to  
16 business school or public health school, that  
17 kind of thing. And I felt to have an analyst  
18 in each class was important because it was  
19 with a big RIF was not clear in November  
20 of '08 that we would get additional, you know,  
21 analysts in the future.  
22 Q. Why does class year matter?  
23 MR. BATTAGLIA: Objection.  
24 Q. I should say, why does level  
25 matter?

Page 211

1 T. G. GREEN  
2 MR. BATTAGLIA: Objection. You  
3 may answer.  
4 A. Again, typically analysts come,  
5 they stay the two years, maybe longer,  
6 sometimes longer and they go. So having  
7 somebody in a class, particularly the first  
8 year class, since the other analysts are  
9 likely to leave, if you have your lower  
10 classes empty, you could end up with no senior  
11 analyst by the time you get to later on.  
12 Q. Did you have any indication that  
13 Brittany Sharpton was going to leave?  
14 MR. BATTAGLIA: Objection. You  
15 may answer.  
16 A. I don't recall any indication.  
17 Q. And an analyst is offered an  
18 opportunity to be an analyst for Citigroup for  
19 two years, correct?  
20 A. I believe that's the policy, yes.  
21 Q. And then Citigroup makes the  
22 decision as to whether to offer an analyst a  
23 third year analyst position, correct?  
24 A. I think that's generally true.  
25 Q. And Brittany could have performed

Page 212

1 T. G. GREEN  
2 Mr. Dockery's job duties?  
3 MR. BATTAGLIA: Objection.  
4 A. Both Brittany and Mr. Dockery were  
5 analysts.  
6 Q. And do you know what the  
7 difference in salary was between Brittany and  
8 Mr. Dockery?  
9 A. I don't. I don't recall.  
10 Q. It wouldn't have been much of a  
11 difference, would it?  
12 A. I don't recall. Probably 10,  
13 20,000, I don't remember.  
14 Q. Would that be considered  
15 significant?  
16 MR. BATTAGLIA: Objection. You  
17 may answer.  
18 A. It is 10 or \$20,000.  
19 Q. But in terms of the directive you  
20 were given by Frank Chin or the criteria you  
21 were given by Frank Chin, is 10 or \$20,000  
22 considered significant to you?  
23 A. You know, every dollar contributes  
24 to the total, but that wouldn't be a big part  
25 of the total.

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
213-216

<p style="text-align: right;">Page 213</p> <p>1 T. G. GREEN</p> <p>2 THE VIDEOGRAPHER: The time is now</p> <p>3 3:25 P.M. This concludes tape four.</p> <p>4 (Recess taken.)</p> <p>5 THE VIDEOGRAPHER: The time is now</p> <p>6 3:37 P.M., this is the beginning of tape</p> <p>7 number five in the videotaped deposition</p> <p>8 of Thomas H. Green.</p> <p>9 Q. Mr. Green, could your group have</p> <p>10 functioned without a first year analyst?</p> <p>11 MR. BATTAGLIA: Objection. You</p> <p>12 may answer.</p> <p>13 A. I think we could have functioned</p> <p>14 without analysts -- first year analyst was</p> <p>15 that your question?</p> <p>16 Q. Yes. Could your group have</p> <p>17 functioned with two second year analysts?</p> <p>18 MR. BATTAGLIA: Objection. You</p> <p>19 may answer.</p> <p>20 A. I am sorry?</p> <p>21 Q. Could your group have functioned</p> <p>22 with two second year analysts and no first</p> <p>23 year analysts?</p> <p>24 MR. BATTAGLIA: And objection, you</p> <p>25 may answer.</p>	<p style="text-align: right;">Page 215</p> <p>1 T. G. GREEN</p> <p>2 A. Depending on the constraints on</p> <p>3 hiring. Sometimes yes, sometimes no.</p> <p>4 Q. So if an analyst leaves and you</p> <p>5 have the ability to hire another analyst to</p> <p>6 replace that person who left, you could do</p> <p>7 that if you chose to, right?</p> <p>8 A. Sometimes I could.</p> <p>9 MR. BATTAGLIA: Objection. You</p> <p>10 may answer.</p> <p>11 A. Sometimes we can do that and</p> <p>12 sometimes we have to wait for the next class.</p> <p>13 (Evaluation form, marked</p> <p>14 Plaintiff's Exhibit 476 for</p> <p>15 identification, as of this date.)</p> <p>16 Q. I am handing you a document that's</p> <p>17 been marked as Plaintiff's Exhibit 476. Can</p> <p>18 you take a look at the document and let me</p> <p>19 know if you have seen it before.</p> <p>20 A. I don't believe I have seen this</p> <p>21 before.</p> <p>22 Q. Did you ever fill out an</p> <p>23 evaluation like this for Mr. Dockery for the</p> <p>24 yearend 2008?</p> <p>25 A. I don't believe I did.</p>
<p style="text-align: right;">Page 214</p> <p>1 T. G. GREEN</p> <p>2 A. I think in the short-term</p> <p>3 possibly. Again, having an analyst at each</p> <p>4 class is something that's helped, particularly</p> <p>5 when there may not be the prospect of</p> <p>6 significant future analysts coming in.</p> <p>7 Q. But it is not essential, is it?</p> <p>8 MR. BATTAGLIA: Objection.</p> <p>9 A. It is fairly important.</p> <p>10 Q. But you could do without it,</p> <p>11 correct?</p> <p>12 MR. BATTAGLIA: Objection.</p> <p>13 A. I think it is fairly important to</p> <p>14 have analysts at each class if you can.</p> <p>15 Q. Can you do without it?</p> <p>16 MR. BATTAGLIA: Yes.</p> <p>17 A. I suppose you could do without it.</p> <p>18 Q. Analysts have left your group in</p> <p>19 the past, correct?</p> <p>20 A. That's correct.</p> <p>21 Q. And I guess in the last few years</p> <p>22 analysts have left too, haven't they?</p> <p>23 A. Yes, they have.</p> <p>24 Q. And have you hired other analysts</p> <p>25 to replace them?</p>	<p style="text-align: right;">Page 216</p> <p>1 T. G. GREEN</p> <p>2 Q. Okay. Do you know if Martin</p> <p>3 Feinstein did?</p> <p>4 A. I don't know.</p> <p>5 Q. Do you know why this document was</p> <p>6 generated?</p> <p>7 MR. BATTAGLIA: Objection.</p> <p>8 A. I don't know why this document was</p> <p>9 generated.</p> <p>10 Q. If I could turn your attention to</p> <p>11 the fourth page of the document.</p> <p>12 MR. BATTAGLIA: CGMI_BART000154?</p> <p>13 MR. DATOO: Yes.</p> <p>14 Q. Just to give it a little bit of</p> <p>15 contrast, turn to the page prior 53, at the</p> <p>16 very bottom, Part II, "goals what business we</p> <p>17 do."</p> <p>18 A. Yes.</p> <p>19 Q. And then if you flip the page</p> <p>20 over:</p> <p>21 "Consistently performed to my</p> <p>22 highest potential while concentrating on</p> <p>23 areas that could cause improvement."</p> <p>24 Do you see that? Under goal one.</p> <p>25 A. I do see that.</p>



THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
241-244

Page 241

1 T. G. GREEN

2 A. GoZone is a special type of

3 tax-exempt bond that was authorized by

4 congress after Hurricane Katrina, whereby

5 corporations making economic development

6 investments rebuilding within the four GoZone

7 damage, hurricane damaged states. Even though

8 they were corporations and operating plans for

9 profit. In certain categories they were

10 eligible to use the municipal market and issue

11 tax project bonds to rebuild or build a

12 facility. And Louisiana is one of the four,

13 obviously, impacted states by Katrina.

14 Q. Underneath that, can you tell me

15 what you wrote?

16 A. "Denver RTD." Which stands for

17 Regional Transit District. "Pres," which is

18 short for presentation. To Lang/Hochtief,

19 which are two private infrastructure firms

20 which I believe we were teamed with in some

21 manner.

22 Q. Underneath that, can you tell me

23 what you wrote?

24 A. That reads, "numbers modeling

25 Excel" which is either excellent or the

Page 242

1 T. G. GREEN

2 program Excel, I don't know.

3 Q. You capitalized the "E."

4 A. It's probably the program.

5 Q. Can you tell me what it says

6 underneath, what you wrote underneath that?

7 A. I wrote "CRRRA RFP proposal."

8 Q. And underneath that I believe it

9 reads good attention to detail.

10 A. That reads good attention to

11 detail.

12 Q. And underneath that, can you tell

13 me what you wrote?

14 A. I wrote, "works with Corrado."

15 Q. William Corrado?

16 A. William Corrado.

17 Q. Underneath that, can you tell me

18 what you wrote?

19 A. I wrote "quiet, shy, nervous."

20 Q. And underneath that?

21 A. I wrote, "client interaction

22 limited."

23 Q. Can you flip to the page stamped

24 1219 on the bottom right-hand corner. Do you

25 see that?

Page 243

1 T. G. GREEN

2 A. Yes.

3 Q. Can you tell me what you wrote at

4 the top of the page?

5 A. I believe that is "SW" for Steve

6 Wood.

7 Q. I was thinking EM, do you have

8 anyone with those initials in your group?

9 A. I don't believe I do.

10 Q. There is a date 6/17/08 and to the

11 right of that does that say "analysts"?

12 A. Yes. Or -- yes, that's what it

13 says, analysts.

14 Q. And I take it that's Brittany's

15 name?

16 A. That's Brittany.

17 Q. And it says, "attention to

18 detail"?

19 A. It says "attention to detail."

20 Q. And underneath that, what does it

21 say?

22 A. It says "agency" versus

23 "authority" and then it says "consistency."

24 So I believe that would be Steve Wood

25 describing probably an RFP draft where the

Page 244

1 T. G. GREEN

2 client was an agency and the draft used the

3 wrong name, the wrong affiliation and places

4 like that.

5 Q. Could it mean that she was

6 consistent in the use of those words?

7 A. I doubt it, given that it follows

8 attention to detail and I have underlined

9 "consistency" as a topic.

10 Q. Could "attention to detail" mean

11 that she paid good attention to detail?

12 A. It could. That's not my memory of

13 the feedback on Brittany, but it could.

14 Q. And under "agency versus

15 authority," I believe it says some

16 improvement.

17 A. Some improvement. I believe that

18 you are right, that's what that says.

19 Q. Do you know what that means?

20 A. I don't recall exactly precisely

21 what that means.

22 Q. And underneath that can you tell

23 me what you wrote?

24 A. I believe that says "development,"

25 meaning what Brittany would need to do to

THOMAS H. GREEN Non-Confidential  
BARTOLETTI vs. CITIGROUP

October 25, 2012  
245-248

<p style="text-align: right;">Page 245</p> <p>1 T. G. GREEN</p> <p>2 develop. And then it says understand the</p> <p>3 context, ask questions or queues questions.</p> <p>4 And then "use the transaction to learn."</p> <p>5 Q. Do you know if Mr. Wood made any</p> <p>6 comments about Matthew Chin?</p> <p>7 A. I don't know.</p> <p>8 Q. Do you recall speaking to him</p> <p>9 about Matt Chin?</p> <p>10 A. I don't recall.</p> <p>11 Q. Jason Baron was an associate in</p> <p>12 June of '08, wasn't he?</p> <p>13 A. I don't remember when he had his</p> <p>14 titles.</p> <p>15 Q. Once promoted to vice president,</p> <p>16 when do they usually get promoted?</p> <p>17 A. Well, in public finance there is</p> <p>18 analysts, there is associates. I believe we</p> <p>19 have some AVP's assistant vice presidents and</p> <p>20 then there is vice presidents, directors,</p> <p>21 managing directors. I don't remember the, you</p> <p>22 know, the number of years and title.</p> <p>23 Q. If I could direct your attention</p> <p>24 to the page stamped 12220. At the bottom --</p> <p>25 near the bottom I believe it reads</p>	<p style="text-align: right;">Page 247</p> <p>1 T. G. GREEN</p> <p>2 me, is that a continuation of the prior page?</p> <p>3 A. Based on the page numbering, I</p> <p>4 believe it is.</p> <p>5 Q. Flip to the next page.</p> <p>6 A. Are we on 12222.</p> <p>7 Q. 6/16/analysts. And I see Matt</p> <p>8 Chin's name on there.</p> <p>9 Can you tell me what you wrote?</p> <p>10 A. I wrote: "Two specialized with</p> <p>11 DL." David Livingstone.</p> <p>12 Q. Do you know what you meant by</p> <p>13 that?</p> <p>14 A. I probably meant that he should do</p> <p>15 more assignments with more different account</p> <p>16 officers.</p> <p>17 Q. Did you take these notes on this</p> <p>18 specific page based on a conversation that you</p> <p>19 had with someone?</p> <p>20 MR. BATTAGLIA: To the extent that</p> <p>21 you recall and to the extent that this</p> <p>22 document helps refreshes are your</p> <p>23 recollection.</p> <p>24 A. I believe I did. I don't see the</p> <p>25 name of that person.</p>
<p style="text-align: right;">Page 246</p> <p>1 T. G. GREEN</p> <p>2 "developmental goals" and it is underlined.</p> <p>3 Do you see that?</p> <p>4 A. Yes.</p> <p>5 Q. And can you tell me what that,</p> <p>6 what you wrote aside number one?</p> <p>7 A. "Understand the deals better."</p> <p>8 Q. Do you know what that means?</p> <p>9 A. Not precisely. I don't know</p> <p>10 precisely what that means.</p> <p>11 Q. Immediately above developmental</p> <p>12 roles, can you tell me what you wrote?</p> <p>13 A. I wrote, "attention to detail very</p> <p>14 strong."</p> <p>15 Q. No, I am sorry, immediately above</p> <p>16 developmental.</p> <p>17 A. Just the one line.</p> <p>18 Q. It is the only one I can't read.</p> <p>19 A. Will do the basic stuff. And then</p> <p>20 it says "TRC," which is like administrative</p> <p>21 committee you have, called the transaction</p> <p>22 review committee. So it is part of the</p> <p>23 paperwork that analysts are supposed to do on</p> <p>24 transactions and other credits.</p> <p>25 Q. And on the next page, can you tell</p>	<p style="text-align: right;">Page 248</p> <p>1 T. G. GREEN</p> <p>2 Q. At the bottom of the page you</p> <p>3 wrote Brittany's name.</p> <p>4 A. Yes.</p> <p>5 Q. Can you tell me what you wrote</p> <p>6 immediately underneath her name?</p> <p>7 A. I wrote "attention to detail</p> <p>8 improving."</p> <p>9 Q. And then underneath that, can you</p> <p>10 tell me what you wrote?</p> <p>11 A. I wrote, "turnaround speed" in</p> <p>12 parentheses I guess, "improving."</p> <p>13 Q. Underneath that, can you tell me</p> <p>14 what you wrote?</p> <p>15 A. I wrote, "sought out more feedback</p> <p>16 and opportunity quantitatively," which was</p> <p>17 good.</p> <p>18 Q. The next page, the last page, at</p> <p>19 the top, can you tell me whose name you wrote?</p> <p>20 A. I believe that's Evan for Evan</p> <p>21 Levine.</p> <p>22 Q. And you wrote Brittany's name on</p> <p>23 this document?</p> <p>24 A. I believe I wrote Brittany's name.</p> <p>25 Q. Other than that, can you tell me</p>